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d/b/a CAESARS PALACE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WILLIAM J. BERRY, JR., CYNTHIA
FALLS, and SHANE KAUFMANN,

Plaintiff(s),

vs.

DESERT PALACE, INC., d/b/a CAESARS
PALACE, DOES I through x, et al.

Defendant(s).

Case No. 2:17-cv-00019-GMN-PAL

**STIPULATION TO EXTEND
DEADLINE TO SUBMIT REDACTED
EXHIBITS**

(First Request)

By Order dated June 17, 2019 (ECF No. 120), Magistrate Judge Weksler denied without prejudice plaintiffs' Motion for Leave to File Under Seal Appendix 3 of Exhibits in Support of Opposition to Motion for Summary Judgment (ECF No. 105). The Order instructed plaintiffs to file their renewed motion on or before June 21, 2019, or plaintiffs' exhibits will be unsealed.

As the proponent of the confidential nature of information contained in plaintiffs' exhibits, such as the identities of Caesars' high-limit customers which Caesars considers highly confidential and proprietary business information, Caesars' counsel desires to work with plaintiffs' counsel in

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1 order to demonstrate a compelling need for the redaction of such information from plaintiffs'
2 exhibits. In this regard, Caesars intends to provide plaintiffs with proposed redacted exhibits for
3 plaintiffs' consideration. However, the exhibits are numerous (requiring the review of plaintiffs'
4 Exhibits 1, 3, 17, 21, 22, 23, 24, 26, 30, 39, 40, 41, 43, 44, 45, 49, 53, 55 and 56 totaling over 300
5 pages) and redaction will be time consuming. Nevertheless, the parties believe that over the next
6 week and a half, they will be able to reach an agreement regarding appropriate information to be
7 redacted from the exhibits (such as customer identities). Upon reaching such agreement, Caesars
8 desires to re-file the exhibits with the appropriate redactions and demonstrate to the Court the
9 compelling need to allow such redactions. Therefore, the parties request that the Court extend the
10 deadline to seek renewed protection of information contained in plaintiffs' Appendix 3 of Exhibits in
11 Support of Opposition to Motion for Summary Judgment by ten (10) days.

12 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs WILLIAM J.
13 BERRY, JR., CYNTHIA FALLS, and SHANE KAUFMANN and Defendant DESERT PALACE,
14 INC. d/b/a CAESARS PALACE, by and through their respective counsel of record, that the deadline
15 to seek renewed protection for information contained in plaintiffs' Appendix 3 of Exhibits in
16 Support of Opposition to Motion for Summary Judgment be extended by ten (10) days up to and
17 including July 1, 2019.

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1 This is the parties' first stipulation to extend the deadline to seek renewed protection of
2 information contained in Appendix 3 of Exhibits in Support of Opposition to Motion for Summary
3 Judgment. This stipulation is made in good faith and for the parties to work together in order to
4 reach an agreement regarding redaction to be presented to the Court. This stipulation is not for the
5 purpose of causing any undue delay, and the parties agree that good cause therefore exists for the
6 extension.

7 Dated: June 21, 2019

Dated: June 21, 2019

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10 /s/ Kathleen J. England
KATHLEEN J. ENGLAND, ESQ.
Gilbert & England Law Firm

/s/ Patrick H. Hicks
PATRICK H. HICKS, ESQ.
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17 Attorneys for Defendant
DESERT PALACE, INC.
dba CAESARS PALACE

18 **ORDER**

19 IT IS SO ORDERED.

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21 UNITED STATES MAGISTRATE JUDGE

22 Dated this 25th day of June, 2019.
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